

BEFORE THE

POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES, 1997

RECEIVED
DEC 3 2 41 PM '97
Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARYDOUGLAS F. CARLSON
MOTION TO COMPEL
UNITED STATES POSTAL SERVICE
TO ANSWER INTERROGATORY DFC/USPS-11

November 28, 1997

I, Douglas F. Carlson, hereby move to compel the Postal Service to provide a responsive answer to interrogatory DFC/USPS-11, which I served on October 14, 1997. This interrogatory reads as follows:

Is the aspect ratio of a rectangular post card relevant to determining whether the card can be processed by automated equipment? If so, why does the nonstandard surcharge that applies to one-ounce nonstandard letters not apply to cards whose aspect ratio is not conducive to automated processing?

A response was due on October 28, 1997.¹ On November 20, 1997, 23 days late, the Postal Service filed the following nonresponsive answer:

The nonstandard surcharge does not apply to cards claimed at the card rate. To qualify for the card rate, a card must meet the dimensional requirements in Domestic Mail Manual section C.100.2.1 which, generally, are consistent with those associated with a standard letter. A card which violates these postcard dimensions does not qualify for the card rate and would have to pay the higher rate.

The question asks whether the aspect ratio is relevant to determining whether a card can be processed by *automated equipment*. DMM § C.100.2.1, which lists the dimension requirements to qualify for the card rate, does not specify an aspect ratio. Pieces that qualify for the card rate will not necessarily meet the aspect-ratio requirement that exists for letters, so a card seemingly could have a deficient aspect

¹ According to § 2(C) of the *Special Rules of Practice*, discovery responses must be filed within 14 days of *service* of the discovery request. Section 12(f) states that the date of service is the date of mailing. Since I served this interrogatory on October 14, 1997, a response was due on October 28, 1997.

ratio.² The Postal Service's response does not answer my initial question, nor does it answer the second part of the question, which asks *why* the nonstandard surcharge does not apply to a card whose aspect ratio does not facilitate automated processing.

This interrogatory is relevant to the Postal Service's proposed 16-cent surcharge for nonstandard First-Class letters and the Postal Service proposed combined 23-cent rate and fee for stamped cards. Specifically, if a card can qualify at the card rate even if it cannot be processed on automated equipment due to a deficiency in its aspect ratio, I intend to explore why that card should pay the same rate³ as a stamped card, which *meets* the aspect-ratio requirement. I also wish to know why the nonstandard surcharge would not apply to that card. This information will assist me in preparing my direct case for pricing of stamped cards.

Further delay in receiving an answer will interfere even more with my preparation of my direct case. Therefore, I move to compel the Postal Service to answer this interrogatory immediately.

Respectfully submitted,



Dated: November 28, 1997

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

November 28, 1997
Emeryville, California

² A card that measures 5" by 4¼" would meet the requirements for the card rate yet have an aspect ratio of 1.18. If this card were a letter, it would be subject to the nonstandard surcharge, since its aspect ratio is less than 1.3. I am seeking to learn why the nonstandard surcharge does not apply to this apparently nonstandard card.

³ Excluding the proposed stamped-card fee; if the two-cent stamped-card fee were included, the stamped card would cost more than the potentially nonstandard, nonautomatable card.